

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Consumer Financial Protection Bureau,

Plaintiff,

v.

Navient Corporation, *et al.*,

Defendants.

Case No. 3:17-CV-00101-RDM
(Hon. Robert D. Mariani)

Electronically Filed

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56(a) and Local Rule 56.1, Plaintiff Consumer Financial Protection Bureau respectfully moves for summary judgment in its favor and against Defendants with respect to liability on all claims in the complaint. As described in the accompanying brief, if summary judgment is granted in the Bureau’s favor, the sole issues remaining for adjudication would be the amount of monetary remedies to assess against Defendants for their violations of federal consumer financial laws (including consumer redress, disgorgement, and civil penalties), and appropriate injunctive relief to impose on Defendants to prevent them from continuing to violate federal consumer financial laws.

A proposed order is being filed with this motion. The Bureau’s supporting brief, statement of undisputed material facts, and exhibits were transmitted to the Court for filing under seal.

Dated: May 19, 2020

Respectfully submitted,

Thomas G. Ward
Enforcement Director

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Deputy Enforcement Director

Thomas Kim
Assistant Deputy Enforcement Director

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Attorneys for Plaintiff

CERTIFICATE OF NONCONCURRENCE

Pursuant to Local Rule 7.1, I certify that I sought concurrence in this motion from counsel for Defendants, and that such concurrence was denied.

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CERTIFICATE OF SERVICE

I certify that, on May 19, 2020, I filed the foregoing document using the Court's ECF system, which will send notification of such filing to counsel for Defendants.

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